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October 18, 2018

VIA ECF AND E-MAIL

The Honorable Shelley C. Chapman
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green
New York, New York 10004

Re: *In re: Lehman Brothers Holdings, Inc.*, Case No.: 08-13555

*Lehman Brothers Holdings Inc. v. 1st Advantage Mortgage, L.L.C.,
et al. Adv. Proc. No. 16-01019*

Dear Judge Chapman:

This firm and Fox Rothschild LLP represent Lehman Brothers Holdings Inc. (the “Plan Administrator”) and respectfully submit this letter to request that its reply to each defendants’ opposition to the Plan Administrator’s (i) Omnibus Motion for Leave to File Third Amended Complaints Pursuant to Rule 7015 of the Federal Rules of Bankruptcy Procedure (Adv. Proc. No. 16-01019, Dkt. No. 636) (the “Motion to Amend the Complaint”) and (ii) Motion For Leave to Amend and Extend the Scope of the ADR Procedures Orders for Indemnification Claims of the Debtors Against Mortgage Loan Sellers (Case No. 08-13555, Dkt. No. 58858) (the “Motion to Amend the ADR Order,” and with the Motion to Amend the Complaint, the “Motions”) be due on October 26, 2018 at 4:00 pm, consistent with Your Honor’s deadline for the Plan Administrator to reply to certain Defendants’ oppositions to the Motions.

Three oppositions to the Motions were filed on October 15, 2018 (the “Three Oppositions”). Consistent with the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures, the Plan Administrator’s reply to those oppositions would be due on October 25, 2018 at 12:00 pm.

On October 11, 2018 certain Defendants requested an extension to oppose the Motions (Adv. Proc. No. 16-01019, Dkt. No. 645). On October 12, 2018, Your Honor directed those Defendants’ oppositions to the Motions be extended to October 23, 2018 at 4:00 pm, with the Plan Administrator’s reply due October 26, 2018 at 4:00 pm. The Plan Administrator now

respectfully requests that its reply to all oppositions be due on that date so it may file one omnibus reply brief. The Plan Administrator has conferred with counsel that filed the Three Oppositions and they consent to this request.

Thank you for your consideration. Please contact me if you have any question.

Respectfully submitted,

/s/ Mara R. Lieber

Mara R. Lieber

cc: All counsel of record (*via ECF*)